



NEPI
ROCKCASTLE



SUSTAINABILTY COMMUNICATION POLICY

Sustainability communication policy

I. Introduction and purpose	3
II. Application	3
III. Reporting procedure	3
IV. Concerns to be raised	4
V. Preserving privacy	4
VI. Final provisions	4
VII. Internal connected regulations	5



Sustainability communication policy» continued



I. INTRODUCTION AND PURPOSE

NEPI Rockcastle Group (“the **Group**”) strongly believes in its duty to be a responsible corporate citizen and achieve the highest standards of sustainability. Under the guidance of the Board of Directors and the permanent coordination from the Social and Ethics Committee, the Group embraces this approach as a driving force of its strategic objectives, influencing significantly its stakeholder’s relationship management and allowing one unified approach towards external stakeholders, local communities, staff, suppliers, investors, analysts, local and central government, peers and non-governmental organizations.

The ‘**Group**’ is committed to high standards of sustainable and transparent business conduct. The employees and representatives of the Group practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This Policy is intended to enable all Group external stakeholders to raise concerns related to the three pillars of sustainability: E/S/G (Environmental, Social and Governance), so that the Group can address queries and plan activities to remedy promptly any non-compliance, shall such be raised.

II. APPLICATION

This Policy deals with any external stakeholder’s concerns or queries in relation to Group assets and operations, and it aims to:

- ensure that all the external parties and stakeholders feel confident in raising concerns related to ESG activities of the Group, to question and act upon their concerns;
- provide ways for external stakeholders to raise those concerns;
- reassure external stakeholders they will be protected from retaliation, if concerns are raised in good faith and reasonable truth.

This Policy complements the overall Group wide Whistleblowing Policy and channels, available from the Group corporate website, open to any stakeholder, existing or potential business partner, employees and collaborators, visitors of commercial centers. Also, contact details of the management of each commercial center are available on commercial centers’ websites. Should any complaint, concern or request reach the Group entities by means of another public communication channel, they are immediately routed to the departments and persons in charge.

Communication channels and focus includes:

1. Relevant and comprehensive information relating to environmental policies and performance of the asset, available for building users, covering mainly the following topics:
 - a. Health, Safety and Environmental policies
 - b. Building/Organizational Operating procedures
 - c. Asset/Organizational environmental performance
 - d. Public transport
 - e. Environmental best practice topics
 - f. Accessibility and equity.
2. Community engagement or positive/proactive engagement with neighbors, such as:
 - a. Online feedback opportunities
 - b. Surveys on and off-site with neighbors
 - c. Public engagement events or meetings
 - d. Participation in existing neighborhood groups/activities

III. REPORTING PROCEDURE

The Group has an open-door policy and recommends that external stakeholders share their concerns, suggestions or complaints related to the Sustainable operations, based on the ESG pillars, of the Company through a secure web portal hosted on the Group’s website in the Sustainability / Focus and Performance section and through the link provided on the shopping centre website under ‘Responsible together” section (available to the wide public and any external stakeholder).

All messages received through the official channels will be directed to the Sustainability Department, who will ensure coordination of the assessment and remediation process, as well as the delivery of all responses. All messages will be reviewed promptly, and, if determined to be necessary, further steps will be planned and/or taken. All messages that require an answer will be addressed promptly, providing the fact that the contact information was included in the message. Where the raised topics/concerns require deeper assessment, the feedback (even if a preliminary one) shall be communicated within 60 days. Anonymous messages cannot be answered, but the topics raised therein shall be assessed and adequately addressed.

Where dealing with the raised topics requires support from other areas of responsibility in the Group, the Sustainability Department would ensure that such areas are involved in the process.

The Sustainability Department shall (i) keep a record with all received inquiries/concerns, as well as the associated mitigation or remedial actions and (ii) regularly analyze the areas/operations/processes relevant from sustainability perspective, to identify areas for improvement.

Topics related to general compliance or data privacy matters or to the Whistleblowing policy, will be directed to the relevant functions, in line with the Group procedures.

IV. CONCERNS TO BE RAISED

External stakeholders and external parties can report, in good faith, any concerns regarding, but not limited to:

- Environmental, Social and Governance aspects of the operation of any shopping centre that the Group owns and operates in relation to standards, procedures, laws, regulations and other legal obligations;
- conduct which is inconsistent with the Group's Sustainability strategy and statements;
- conduct which is inconsistent with the Group's incompliance with the Group's Sustainability related policies and procedures;
- conduct which is materially inconsistent with the Sustainability commitments, including material breaches that may cause harm to the environment, the communities, people in general or Group's employees in particular;
- any questions or concerns related to the sustainability topics in a broader sense.

V. PRESERVING PRIVACY

In managing the reported cases, under this Policy, the Group applies **the principles and rules defined by the Group General Data Privacy Policy**,

Personal data. Under this Policy, Personal Data means any information that relates to an identified or identifiable natural person, as defined by data privacy legislation.

Data minimisation

- The Group recommends stakeholders to refrain from providing in their statements or communications referred to by this Policy, details regarding the health state of another person or other details regarding sensitive data belonging to another person (e.g. religious, political or sexual orientation etc.); where in her/his statement/communication, the stakeholder happens to disclose such information, the Group will not process it and will delete it, unless the Group holds a legitimate ground to continue processing, under applicable law.
- When access is granted to the personal information of any concerned individual, the personal information of third parties such as informants, concerned stakeholders or witnesses should be removed from the documents except in exceptional circumstances, if (i) the whistleblower authorises such a disclosure, (ii) this is required by any subsequent criminal law proceedings or (iii) it has been confirmed the whistleblower maliciously makes a false statement, (iv) the Group holds a legitimate ground to continue processing, under applicable law.

Storage

- Personal information shall not be kept for a longer period than necessary having regard to the purpose of the processing, while personal information that is not relevant to the investigations shall not be further processed.
- When an initial assessment is carried out, but it reveals that the case is not within the scope of this Policy, then the report shall be deleted or referred to the right channel.
- In case of closed cases, references thereto and relevant documentation shall be kept for audit purposes or in case they are needed in litigations or other similar procedures, for a period of 10 (ten) years.

Information and transparency. The coordinates of the processing of external stakeholders' or external party's personal data by the Group, as Data Controller, are detailed in the **Data Privacy Policy**, published on the Group's website.

VI. FINAL PROVISIONS

The Group is committed to address issues/concerns and process/operations related optimization suggestions and is therefore transparent in the communication with the concerned stakeholders, focuses on deep dive of relevant risk management processes, sustainability, development process,

Sustainability communication policy» continued



community involvement and wherever else relevant and act upon it where in line with its sustainability strategy and internal policies.

For the purpose to preserve such desiderates, the Group encourages all external stakeholders, as well as its own personnel and partners to speak-up and raise concerns, share optimization suggestions regarding processes and operations impacting or potentially impacting sustainably pillars.

VII. INTERNAL CONNECTED REGULATIONS

Group Code of Ethics
Group Whistleblowing Policy
Group Sustainable Procurement Policy

Group Environmental Policy
Group Risk Management Policy
Group Risk Appetite Statement



